

Adam P. Segal, Esq.  
Nevada Bar No. 6120  
Bryce C. Loveland, Esq.  
Nevada Bar No. 10132  
Christopher M. Humes  
Nevada Bar No. 12782  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
Facsimile: (702) 382-8135  
Email: asegal@bhfs.com  
Email: bcloveland@bhfs.com  
Email: chumes@bhfs.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE  
PLUMBERS AND PIPEFITTERS LOCAL  
525 HEALTH AND WELFARE TRUST  
AND PLAN; BOARD OF TRUSTEES OF  
THE PLUMBERS AND PIPEFITTERS  
UNION LOCAL 525 PENSION PLAN;  
AND BOARD OF TRUSTEES OF  
PLUMBERS AND PIPEFITTERS LOCAL  
UNION 525 APPRENTICE AND  
JOURNEYMAN TRAINING TRUST FOR  
SOUTHERN NEVADA,

Plaintiffs,

vs.

FRANCISCO GONZALEZ-FARIAS, an  
individual; HUDSON INSURANCE  
AGENCY, a New York corporation;  
MOUNTAIN LION PLUMBING, INC., a  
Nevada corporation; GABRIELLA  
NAVARRO, an individual; SECURITY  
PLUMBING AND AIR CONDITIONING,  
a Nevada corporation,

Defendants.

Lead Case No. 2:14-cv-01027-APG-PAL

Consolidated with Case No. 2:15-cv-00824-  
APG-CWH and 2:15-cv-01148-LDG-GWF

**RENEWED MOTION FOR  
JUDGMENT DEBTOR  
EXAMINATIONS OF GABRIELLA  
NAVARRO, FRANCISCO GONZALEZ-  
FARIAS, MOUNTAIN LION  
PLUMBING, INC., AND SECURITY  
PLUMBING AND AIR  
CONDITIONING**

On March 8, 2017, the Court entered a judgment in favor of the Plaintiffs, the Boards of Trustees of the Plumbers and Pipefitters Union Local 525 Health and Welfare Trust and Plan, the Plumbers and Pipefitters Union Local 525 Pension Plan, and the Plumbers and Pipefitters Local Union 525 Apprentice and Journeyman Training Trust for Southern Nevada (collectively "Trust Funds") and against Francisco Gonzalez-Farias ("Gonzalez"), Gabriella Navarro ("Navarro"), Mountain Lion Plumbing, Inc., ("Mountain Lion Plumbing") and Security Plumbing and Air Conditioning ("Security Plumbing"), (collectively "Defendants"), jointly and severally, in the amount of \$1,927,376.00. Defendants have failed to satisfy the judgment.

On May 17, 2017, the Court previously authorized the Trust Funds to conduct judgment debtor examinations of all Defendants to occur June 20-21, 2017. (Order (ECF No. 118).) The Trust Funds served the Court's orders on an individual named Christian on June 15, 2017, who admitted to being a co-resident. (Affidavit of Service (ECF No. 122, filed June 21, 2017).)

The Defendants, however, did not appear. The Trust Funds then moved for an Order to Show Cause (the "Motion for OSC"). (Motion for OSC (ECF No. 123, filed July 17, 2017).) The Court denied the Motion on the grounds that the Trust Funds did not provide enough notice to the Defendants for both the production of documents and the judgment debtor examinations. (Order Denying Motion for OSC (ECF No. 124, filed July 27, 2017).) The Court granted the Trust Funds leave to refile a motion for judgment debtor examinations. (*Id.*)

In accordance with the Court's July 27, 2017, Order, the Trust Funds resubmit their request to perform examinations of Gonzalez, as an individual judgment debtor and as the owner Security Plumbing, and Navarro, as an individual judgment debtor and as the owner of Mountain Lion Plumbing, with the deposition dates set approximately sixty days out from the date of the instant Motion.

Pursuant to Rule 69(a) of the Federal Rules of Civil Procedure, a judgment creditor may pursue execution of a judgment in accordance with any procedure or practice of the State in which the district court is sitting. Nevada Revised Statute 21.270 provides that a judgment creditor may depose a judgment debtor regarding his property and assets. Specifically, this statute provides:

1           1. A judgment creditor, at any time after the judgment is entered, is  
2           entitled to an order from the judge of the court requiring the judgment  
3           debtor to appear and answer upon oath or affirmation concerning his or her  
4           property, before:

5                   (a) The judge or a master appointed by the judge; or

6                   (b) An attorney representing the judgment creditor,

7           at a time and place specified in the order. No judgment debtor may be  
8           required to appear outside the county in which the judgment debtor resides.

9           2. If the judgment debtor is required to appear before any person other  
10          than a judge or master:

11                   (a) The oath or affirmation of the judgment debtor must be  
12                   administered by a notary public; and

13                   (b) The proceedings must be transcribed by a court reporter or  
14                   recorded electronically. The transcript or recording must be  
15                   preserved for 2 years.

16          3. A judgment debtor who is regularly served with an order issued  
17          pursuant to this section, and who fails to appear at the time and place  
18          specified in the order, may be punished for contempt by the judge issuing  
19          the order.

20           The Trust Funds are informed and believe that Gonzalez and Navarro both reside in Clark  
21          County, Nevada. Therefore, the Trust Funds request that the Court sign the Orders, attached as  
22          Exhibits 1 through 4, requiring Gonzalez and Navarro to provide documents relating to Mountain  
23          Lion Plumbing's, Security Plumbing's and their property and assets on or before the date of the  
24          examinations. The Orders also command Navarro and Gonzalez to appear at the Trust Funds'  
25          counsel's office on the dates and times indicated on the face of the Orders for examinations under  
26          oath and to answer questions relating to their and Mountain Lion Plumbing's and Security  
27          Plumbing's property and assets.  
28

1           Upon receiving executed copies of the Orders, the Trust Funds will serve Gonzalez and  
2 Navarro with copies of the Orders providing notice of the time and place of their examinations at  
3 least thirty-seven (37) days before the examination date.

4  
5 Dated: August 9, 2017

BROWNSTEIN HYATT FARBER SCHRECK, LLP

6 /s/ Christopher M. Humes

7 Adam P. Segal, Esq.

8 Nevada Bar No. 6120

9 Bryce C. Loveland, Esq.

10 Nevada Bar No. 10132

11 Christopher M. Humes

12 Nevada Bar No. 12782

13 100 North City Parkway, Suite 1600

14 Las Vegas, Nevada 89106-4614

15 Telephone: (702) 382-2101

16 Facsimile: (702) 382-8135

17 *Attorneys for Plaintiffs*

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
(702) 382-2101

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that I am an employee of Brownstein Hyatt Farber Schreck, LLP and that on August 9, 2017, I served a true copy of the foregoing **RENEWED MOTION FOR JUDGMENT DEBTOR EXAMINATIONS OF GABRIELLA NAVARRO, FRANCISCO GONZALEZ-FARIAS, MOUNTAIN LION PLUMBING, INC., AND SECURITY PLUMBING AND AIR CONDITIONING** upon:

Francisco Gonzales-Farias  
4213 Lower Saxon  
North Las Vegas, NV 89085

Gabriella Navarro  
4213 Lower Saxon  
North Las Vegas, NV 89085

Security Plumbing & Air Conditioning  
c/o Francisco Gonzalez-Farias  
4213 Lower Saxon  
North Las Vegas, NV 89085

Mountain Lion Plumbing, Inc.  
c/o Gabriella Navarro  
4008 Alameda Ave.  
Las Vegas, NV 89110

Mountain Lion Plumbing, Inc.  
c/o Francisco Bacerra  
80 Levi Ave.  
Las Vegas, NV 89103

☒ a. BY U.S. MAIL

☒ b. BY CM/ECF SYSTEM

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Wendy Cosby

An Employee of Brownstein Hyatt Farber Schreck, LLP

BROWNSTEIN HYATT FARBES SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
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100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106-4614  
Telephone: (702) 382-2101  
Facsimile: (702) 382-8135  
Email: asegal@bhfs.com  
Email: bcloveland@bhfs.com  
Email: chumes@bhfs.com

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE  
PLUMBERS AND PIPEFITTERS LOCAL  
525 HEALTH AND WELFARE TRUST  
AND PLAN; BOARD OF TRUSTEES OF  
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FRANCISCO GONZALEZ-FARIAS, an  
individual; HUDSON INSURANCE  
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MOUNTAIN LION PLUMBING, INC., a  
Nevada corporation; GABRIELLA  
NAVARRO, an individual; SECURITY  
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a Nevada corporation,

Defendants.

Lead Case No. 2:14-cv-01027-APG-PAL

Consolidated with Case No. 2:15-cv-00824-  
APG-CWH and 2:15-cv-01148-LDG-GWF

**ORDER ON MOTION FOR  
JUDGMENT DEBTOR  
EXAMINATION OF SECURITY  
PLUMBING AND AIR  
CONDITIONING**

**Date: October 6, 2017**

**Time: 12:00 p.m.**

1 The Court, having reviewed the Motion for Judgment Debtor Examinations of Francisco  
2 Gonzalez-Farias ("Gonzalez"), Gabriella Navarro, Mountain Lion Plumbing, Inc., and Security  
3 Plumbing and Air Conditioning ("Security Plumbing"), submitted by the Plaintiffs, Boards of  
4 Trustees of the Plumbers and Pipefitters Union Local 525 Health and Welfare Trust and Plan's,  
5 the Plumbers and Pipefitters Union Local 525 Pension Plan's, and the Plumbers and Pipefitters  
6 Local Union 525 Apprentice and Journeyman Training Trust for Southern Nevada's (collectively,  
7 "Trust Funds"), being fully advised, and good cause appearing:

8  
9 IT IS HEREBY ORDERED, that Francisco Gonzalez-Farias, owner of Security Plumbing,  
10 shall appear at the office of Brownstein Hyatt Farber Schreck, LLC, located at 100 North City  
11 Parkway, Suite 1600, Las Vegas, Nevada, 89106, on October 6, 2017, at 12:00 p.m. for a  
12 judgment debtor examination regarding Security Plumbing's property and assets.

13 IT IS FURTHER ORDERED, that Gonzalez shall produce to the Trust Funds' counsel at  
14 100 North City Parkway, Suite 1600, Las Vegas, Nevada 89106, one (1) week prior to the  
15 examination, the following documents:

16  
17 Any and all documents evidencing the current ownership of Security Plumbing's stock,  
18 including the name and address of such owners;

19 Any and all documents regarding real property currently owned by Security Plumbing,  
20 including but not limited to location, value, mortgage, mortgage payments, liens, or the like  
21 regarding such real property;

22 A complete current inventory list of assets owned by Security Plumbing, including but not  
23 limited to, office equipment, vehicles, and accounts receivable;

24 The last twelve (12) statements for each and every one of Security Plumbing's bank  
25 accounts in existence during such twelve (12) months, without regard to whether such account  
26 remains open;  
27  
28

1 Any and all documents regarding real property disposed of by Security Plumbing in the  
2 last five (5) years;

3 Copies of all existing contracts under which Security Plumbing is (a) currently performing  
4 work, (b) has completed work but is owed payment of any amount, or (c) will commence work in  
5 the future; and  
6

7 Any and all documents evidencing for whom Security Plumbing has performed work in  
8 the past two (2) years, and all records showing the number of hours worked by Security  
9 Plumbing's employees in the past two years, and on what projects all such work was performed.

10 DATED: August 11, 2017

11  
12   
13 UNITED STATES DISTRICT/MAGISTRATE JUDGE

14 Submitted by:

15  
16 BROWNSTEIN HYATT FARBER SCHRECK,  
17 LLP

18 /s/ Christopher M. Humes

19 Adam P. Segal, Esq.  
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24 Nevada Bar No. 12782  
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28 Facsimile: (702) 382-8135

*Attorneys for Plaintiffs*